1 2 3 4 5	Adam P. Segal, Esq. Nevada Bar No. 6120 Aaron B. Fricke, Esq. Nevada Bar No. 11129 BROWNSTEIN HYATT FARBER SCHRECK, 100 N. City Parkway, Suite 1600 Las Vegas, Nevada 89106 Telephone: (702) 382-2101 Facsimile: (702) 382-8135	LLP	
6	Attorneys for Plaintiffs		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
	TRUSTEES OF THE ELECTRICAL	CASE NO. 2:11-CV-02013-PMP-VCF	
10	WORKERS HEALTH AND WELFARE	CASE NO. 2.11 OV 02010 1 WII VOI	
11	TRUST; TRUSTEES OF THE ELECTRICAL WORKERS PENSION		
12	TRUST; AND TRUSTEES OF THE LAS VEGAS ELECTRICAL JOINT		
13	APPRENTICESHIP AND TRAINING TRUST FUND,	STIPULATED/CONSENT JUDGMENT	
14	Plaintiffs,		
15	i iaiitiiis,		
16	VS.		
17	CASINO SIGNS & GRAPHIC, INC., d/b/a CASINO LIGHTING & SIGN, a Nevada		
18	corporation,		
19	Defendant.		
20			
21	CASINO SIGNS & GRAPHIC, INC.,	d/b/a CASINO LIGHTING & SIGN, a Neva	

CASINO SIGNS & GRAPHIC, INC., d/b/a CASINO LIGHTING & SIGN, a Nevada corporation ("Employer"), hereby stipulates and consents to entry of judgment in favor of Plaintiffs, Trustees of the Electrical Workers Health and Welfare Trust, and Trustees of the Electrical Workers Pension Trust (collectively the "IBEW Joint Trust Funds"), and against Employer in the total sum of \$505,301 for delinquent employee benefit contributions, liquidated damages, and related costs and fees owed under the Employee Retirement Income Security Act of 1974 ("ERISA").

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The parties have stipulated and therefore the Court finds:

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- 1. Employer is signatory to and bound by the terms of a collective bargaining agreement ("CBA") with the International Brotherhood of Electrical Workers, Local No. 357 ("Union"), in which Employer agreed to abide by the trust agreements establishing the respective IBEW Joint Trust Funds and any amendments thereto ("Trust Agreements").
- 2. Under the CBA and the Trust Agreements, Employer is obligated to pay employee benefit contributions to the IBEW Joint Trust Funds on behalf of Employer's bargaining unit employees represented by the Union.
- 3. Based on remittance reports prepared and submitted by Employer for the months of January 2011 through June 2011, and an audit of the Employer for the months of October 2006 through June 2010, Employer owes the IBEW Joint Trust Funds \$500,301 in unpaid employee benefit contributions, past interest, liquidated damages, audit fees, administrative fees, and past attorney's fees.
- 4. In addition, in the event this judgment must be executed, the IBEW Joint Trust Funds will incur additional fees and costs determined by the parties to be at least \$5,000, which are therefore included herein.

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1	5. This Stipulated/Consent Judgn	nent is entered into by and between Employer and
2	the IBEW Joint Trust Funds for employee ben	efit contributions and related costs and fees owed to
3	the IBEW Joint Trust Funds by ERISA.	
4	August 31, 2011.	August 32, 2011.
5		
6	BROWNSTEIN HYATT FARBER SCHRECK, LLP	CASINO SIGNS & GRAPHIC, INC., d/b/a CASINO LIGHTING & SIGN, a Nevada
7		corporation
8	Adam P. Segal, Esq.	Mark Johnson
9	Nevada Bar No. 6120 Aaron B. Fricke, Esq.	President and Director 3665 West Diablo Drive
10	Nevada Bar No. 11129	Las Vegas, Nevada 89118
11	100 N. City Parkway, Suite 1600 Las Vegas, Nevada 89106	Telephone: <u>702.739-6</u> 789 Facsimile: <u>702.739-9</u> 618
12	Telephone: (702) 382-2101 Facsimile: (702) 382-8135	For Casino Signs & Graphics, Inc., d/b/a Casino
13	, , ,	Lighting & Sign, a Nevada corporation
14	Attorneys for the IBEW Joint Trust Funds	
15	JUI	<u>OGMENT</u>
15 16		· ·
	Judgment is hereby entered against C	asino Signs & Graphics, Inc., d/b/a Casino Lighting
16	Judgment is hereby entered against C & Sign, a Nevada corporation, and in favor	· ·
16 17	Judgment is hereby entered against C	asino Signs & Graphics, Inc., d/b/a Casino Lighting
16 17 18	Judgment is hereby entered against C & Sign, a Nevada corporation, and in favor	asino Signs & Graphics, Inc., d/b/a Casino Lighting of the IBEW Joint Trust Funds in the amount of
16 17 18 19	Judgment is hereby entered against C & Sign, a Nevada corporation, and in favor \$505,301.	asino Signs & Graphics, Inc., d/b/a Casino Lighting of the IBEW Joint Trust Funds in the amount of
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STATE OF NEVADA	)
COUNTY OF <u>Clark</u>	) ss )
Maula Ialanaan Isaina	£

Mark Johnson, being first duly sworn, deposes and says:

That he is the President and a Director of Casino Signs & Graphics, Inc., also d/b/a Casino Lighting & Sign, a Nevada corporation, and is duly authorized to execute this document; that he has read the foregoing Stipulated/Consent Judgment and knows the contents thereof; that the same is true of his own knowledge, except for those matters therein stated on information and belief, and as to those matters he believes them to be true.

Mach Johnson

Subscribed and sworn to before me this 22 day of Pugus +, 2011.

- NOTARY PUBLIC -

